

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

DANIEL NKEMAKOLAM, MICHAEL  
ADIGHIBE, NGOZI IBEJI, JOHN NWAHOA,  
GODSWILL UCHE, PHILIP NWANKO,  
EMMANUEL ONOKALAH, CHARLES  
OSUWAH, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

LOCUS TELECOMMUNICATIONS, INC.,

Defendant.

Civil Action No.: 07-cv-1281

**JOINT MOTION TO  
EXTEND DEADLINE FOR  
DEFENDANT TO ANSWER,  
MOVE, OR OTHERWISE  
RESPOND TO COMPLAINT**

The parties, by their counsel, request that the Court enter an order extending the deadline for Defendant Locus Telecommunications, Inc. ("Locus") to answer, move, or otherwise respond to Plaintiffs' Complaint. The current deadline is June 4, 2007. The parties respectfully request that the Court extend this deadline to August 3, 2007. The grounds upon which this Joint Motion is based are set forth below.

1. Locus was served with a copy of the Complaint on April 23, 2007.
2. Pursuant to Federal Rule of Civil Procedure 12, Locus was required to answer, move, or otherwise respond to the Complaint by May 14, 2007.
3. Pursuant to Local Civil Rule 6.1(b), Locus sought and obtained a 15-day extension of the time within which to answer, move, or otherwise respond to the Complaint. Accordingly, the time for Locus to answer, move, or otherwise respond to the Complaint was extended to Monday, June 4, 2007.

4. The parties believe that the current deadline for Locus to answer, respond, or otherwise move with respect to the Complaint should be extended to allow them additional time to pursue discussions regarding a potential resolution of this matter.

5. The parties have requested a 60-day extension of the current deadline, which they believe is a reasonable period for them to continue the discussions mentioned above, and should these discussions not lead to a resolution of this matter, provide Locus with a reasonable period of time within which to prepare its response to the Complaint.

**SUPPORTING MEMORANDUM OF LAW**

6. Rule 6(b), Federal Rules of Civil Procedure, provides that a court, for cause shown, may at any time in its discretion and upon motion of a party, enlarge a period of time in which an act is to be conducted under the Federal Rules of Civil Procedure. Fed. R. Civ. P. 6(b). Based on the foregoing, the parties' counsel respectfully submit that good cause has been demonstrated for the granting of the requested enlargement of time.

**CONCLUSION**

Based on the foregoing, the parties respectfully request this Court to grant the relief requested in the Joint Motion and extend the deadline for Locus to answer, move, or otherwise respond to Plaintiff's Complaint to August 4, 2007.

Respectfully submitted,

**GREENBERG TRAURIG, LLP**  
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*Locus Telecommunications, Inc.*

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Dated: June 4, 2007

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*So Ordered:*  
*Esther Salas dated 6/9/07*  
\_\_\_\_\_  
HONORABLE ESTHER SALAS  
United States Magistrate Judge